

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-10300033-2013**

Application Received: **April 23, 2012**

Plant Identification Number: **03-54-10300033**

Permittee: **Equitrans, L.P.**

Facility Name: **Logansport #49 Compressor Station**

Mailing Address: **Route 1, Box 26, Smithfield, WV 25437**

Revised: NA

Physical Location:	Smithfield, Wetzel County, West Virginia
UTM Coordinates:	538.78 km Easting • 4378.47 km Northing • Zone 17
Directions:	From Smithfield, take W. Virginia 20 N for 1.1 miles and turn right onto Co Rd 7/8/Fallen Timber Run Rd. Go 3.5 miles and turn right onto Co Rd 80/Shuman Hill. Continue 1.5 miles and turn left onto Co Rd 17/17/N. Station will be 0.2 miles to the northwest.

Facility Description

The Logansport #49 Station is a natural gas transmission facility covered by NAICS 48210 and SIC 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of two (2) 800-hp natural gas internal combustion reciprocating engines, two (2) electric generators, one (1) triethylene glycol dehydrator, one (1) heating boiler, two (2) dehydration reboilers, one (1) indirect gas fired heater, one (1) line heater, and five (5) tanks of various sizes. In addition there is a dry bed desiccant dehydration unit that produces negligible emissions. The Logansport #49 compressor station is used to compress storage gas.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2010 Actual Emissions
Carbon Monoxide (CO)	90.71	16.3
Nitrogen Oxides (NO _x)	230.30	99.6
Particulate Matter (PM ₁₀)	3.41	1.2
Total Particulate Matter (TSP)	3.41	1.2
Sulfur Dioxide (SO ₂)	0.06	< 0.1
Volatile Organic Compounds (VOC)	9.40	6.6
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2010 Actual Emissions
HAPS	6.22	1.7
Benzene	0.17	< 0.1
Ethylbenzene	0.11	< 0.1
Toluene	0.18	< 0.1
Xylenes	0.62	< 0.1
n-Hexane	0.08	< 0.1
Formaldehyde	3.65	1.7
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		
Other Regulated Pollutants	Potential Emissions	Actual Emissions
CO _{2e}	11,378	NA

Title V Program Applicability Basis

This facility has the potential to emit 230.30 tons per year of NO_x. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Equitrans, L.P. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers
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	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart ZZZZ	Stationary Reciprocating Internal Combustion Engines
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	To Prevent and Control Particulate Air Pollution from Materials Handling Preparation, Storage and Other Sources of Fugitive Particulate Matter

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
NA		

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

The emission unit descriptions of emission unit IDs 003-01 and 003-02 were corrected to read reciprocating engine/generator instead of reciprocating engine/air compressor.

The indirect gas fired line heater installed in 2011 was added to the Emission unit table and to Section 5.0.

It was determined that the reciprocating engines (001-01, 002-01, 003-01, and 003-02) become subject to 40 C.F.R. 63 Subpart ZZZZ on October 19, 2013. The applicable requirements for the engines are as follows:

- The permittee must comply with the general provisions of 40 C.F.R. 63 as shown in Table 8 of 40 C.F.R. Part 63 except for those sections listed in 40 C.F.R. § 63.6645(a)(5).

- The compressor engines 001-01 and 002-01 are classified as 2-stroke, lean-burn, non-emergency, spark ignition (SI) units greater than 500 hp at an area source and as such are subject to requirements for such from Table 2d of 40 C.F.R 63 Subpart ZZZZ.
- The generators 003-01 and 003-02 are classified as 4-stroke, lean burn, non-emergency, SI units less than 500 horsepower at an area source and as such are subject to requirements for such from Table 2d of 40 C.F.R 63 Subpart ZZZZ.
- The permittee must demonstrate continuous compliance with each emission limitation or operating limitation in Table 2d of 40 C.F.R. 63 Subpart ZZZZ that applies according to the appropriate methods from Table 6 of 40 C.F.R. 63 Subpart ZZZZ.
- The permittee must comply with the following applicable monitoring requirements of 40 C.F.R. 63 Subpart ZZZZ: 40 C.F.R. §§ 63.6625(e), (h), and (j).
- The permittee must keep records in accordance with 40 C.F.R § 63.6655, except for 40 C.F.R §§ 63.6655(c) and (f) which do not apply.
- The permittee must report each instance in which each applicable emission limitation or operating limitation in Table 2d of 40 C.F.R 63 Subpart ZZZZ was not met. These instances are deviations from the emission and operating limitations of 40 C.F.R 63 Subpart ZZZZ. These deviations must be reported according to the requirements of 40 C.F.R § 63.6650.
- The permittee must report each instance in which the applicable requirements in Table 8 of 40 C.F.R Part 63 Subpart ZZZZ were not met.

These requirements were added to the Title V permit as conditions 4.1.1, 4.1.2, 4.1.3, 4.2.1, 4.4.1, 4.5.1, and 4.5.2.

The following changes were made to Section 5.0 Source-Specific Requirements [TEG Dehydrator, Dry Bed Dehydrator, Heating Boiler, Dry Bed Dehydrator Boiler, TEG Dehydrator Boiler, Heater, and Line Heater]:

- The following sections of the previous Title V permit were deleted because they related to the benzene exemption for 40 CFR 63 Subpart HHH which does not apply because the facility is an area source: 5.1.1(b) , 5.1.3, and 5.4.5.
- A new section 5.1.2 was added to require monitoring, testing, and reporting to demonstrate the source is not major for HAPs, and therefore not subject to 40 C.F.R. 63 Subpart HHH.
- Section 5.1.2 was renumbered as 5.1.3.
- Section 5.2.1. was revised to require monitoring of actual operating parameters to be used in the HAP calculations instead of those monitored during the wet gas sampling or those providing the highest HAP emissions.
- Section 5.2.2 was modified to require records be maintained of the visual inspections.
- Section 5.2.3 was added to provide the method to demonstrate compliance with the 10 percent opacity limit of 45CSR§2-3.1.
- Section 5.3.1 was modified to implement a testing frequency for the wet natural gas content entering the dehydration unit.

- Sections 5.4.1, 5.4.2, and 5.4.3 have been combined as section 5.4.1 and modified to require annual records of HAP emissions based on the operating parameters monitored and recorded under section 5.2.1 and the sampling of the wet gas under 5.3.1.
- Section 5.5.1 was added to require submittal of reports after the wet gas analysis is conducted.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45CSR21	Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds. Logansport #49 station is not located in Cabell, Kanawha, Putnam, Wayne, or Wood counties that are affected by 45CSR21.
45CSR27	To Prevent and Control the Emissions of Toxic Air Pollutants. Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment "used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight."
40 C.F.R. 60 Subpart Dc	This subpart applies to steam generating units greater than 10 MMBtu/hr and less than 100 MMBtu/hr. Logansport # 49 Station does not have any steam generating units greater than 10 MMBtu/hr.
40 C.F.R. 60 Subpart GG	Standards of Performance for Stationary Gas Turbines. There are no turbines at the Logansport #49 Compressor Station.
40 C.F.R. 60 Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978. All tanks are below 40,000 gallons in capacity.
40 C.F.R. 60 Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984. All tanks are below 40,000 gallons in capacity.
40 C.F.R. 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. All tanks storing volatile organic liquids are below 75 m ³ in capacity.
40 C.F.R. 60 Subpart KKK	Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants. Logansport #49 Compressor Station is not engaged in the extraction of natural gas from field gas or in the fractionation of mixed natural gas liquids to natural gas products.
40 C.F.R. 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO ₂ Emissions. There are no sweetening units at the Logansport #49 Compressor Station.
40 C.F.R. 60 Subpart IIII	Standards of performance for Stationary Compression Ignition Engines. All engines at Logansport #49 Compressor Station are spark ignition engines.
40 C.F.R. 60 Subpart JJJJ	This subpart applies to stationary spark ignition internal combustion engines that have been constructed, reconstructed, or modified after various dates, the earliest of which is June 12, 2006. All the engines at Logansport #49 Compressor Station were installed before June 12, 2006 and have not been reconstructed or modified.
40 C.F.R. 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines. There are no turbines at the Logansport #49 Compressor Station.
40 C.F.R. 63 Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities. The Logansport #49 Compressor Station is not subject to Subpart HH since Logansport #49 Compressor Station is not a natural gas production facility.

40 C.F.R. 63 Subpart HHH	Natural Gas Transmission and Storage Facilities. The Logansport #49 Compressor Station is a transmission facility but it is an area source of HAPs thus is not subject to this rule.
40 C.F.R. 63 Subpart DDDDD	This MACT standard applies to Industrial, Commercial, and Institutional Boilers and Process Heaters at major sources of HAPs. Logansport #49 Compressor Station is not major for HAPs.
40 C.F.R. 63 Subpart JJJJJ	This MACT standard applies to industrial, commercial, and institutional boilers at area sources of HAPs. All boilers at Logansport #49 Compressor Station fire natural gas exclusively. Natural gas boilers are exempt from the rule per 40 C.F.R. §63.11195(e).
40 C.F.R. Part 64	The facility does not have any pollutant specific emissions units (PSEU) at this facility that satisfy all of the applicability criteria requirements of 40 CFR §64.2(a), i.e., that: 1) have pre-control regulated pollutant potential emissions (PTE) equal to or greater than the “major” threshold limits to be classified as a major source; 2) are subject to an emission limitation or standard and; 3) have a control device to achieve compliance with such emission limitation or standard. Therefore, the facility is not subject to the Compliance Assurance Monitoring (CAM) rule.
GHG Tailoring Rule	Facility is not a major GHG source and there has been no construction or modifications to trigger PSD or an increase of 75,000 tons/year CO ₂ e. Therefore the GHG Tailoring Rule does not apply.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: November 28, 2012

Ending Date: December 28, 2012

All written comments should be addressed to the following individual and office:

Robert Mullins
 Title V Permit Writer
 West Virginia Department of Environmental Protection
 Division of Air Quality
 601 57th Street SE
 Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Comments Received 12/17/2012 and 12/28/2012 from Thomas Hadden with EQT

1. Condition 3.3.1 Stack Testing

12/17/2012 Comments

Paragraph d is a new addition to existing requirements, and describes Reporting Requirements. The condition appears to be an unnecessary addition to general testing requirements. EQT objects to this new requirement as it significantly increases the reporting burden by including provisions for a detailed “compliance status evaluation”. The cited authority (45CSR13) does not seem relevant to the imposition of this new requirement.

In addition, the requirement that the report include a certification is redundant with the requirement at 3.5.1, and may be deleted.

The new requirements stipulate a summary of conditions that typically is included in tabular form in each test report, identifying a citation of the condition, results and compliance status. We are concerned that this additional specification potentially increases the burden of preparing a report, without actually improving the information being submitted. For this facility, the site-specific testing to be performed in accordance with condition 5.3.1, does not lend itself to the reporting information stipulated in condition 3.3.1.d. EQT requests that condition 3.3.1 be deleted.

12/28/2012 Revised Comments

Paragraph d of condition 3.3.1 describes Reporting Requirements related to stack tests.

The requirements stipulate a summary of conditions which form the basis for the evaluation, and a statement of compliance status. The current wording would require signatures on both of these report elements. EQT suggests the following revision to simplify this requirement and avoid the need to double-sign the reports, without altering the requirement in any substantive way:

The permittee shall submit a report of the results of the stack test within 60 days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: ~~the certification described in paragraph 3.5.1;~~ a statement of compliance status, ~~also signed by a responsible official; and,~~ a summary of conditions which form the basis for the compliance status evaluation; and the certification described in paragraph 3.5.1. The summary of conditions shall include the following:

1. The permit or rule evaluated, with the citation number and language.
2. The result of the test for each permit or rule condition.
3. A statement of compliance or non-compliance with each permit or rule condition.

Response: Condition 3.3.1.d requires the following: 1) the certification described in paragraph 3.5.1; 2) a statement of compliance status signed by a responsible official; and 3) a summary of conditions which form

the basis for the compliance status evaluation. The certification described in 3.5.1. and the statement of compliance status may be submitted as one page in order to avoid the need to “double-sign the reports” as stated in in your comment. If these two elements were combined onto one page, you would need to have a statement which read “based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete” along with a separate statement of compliance status, but the signature by the responsible official could be for both statements on the same page. Since the concerns addressed by the commenter can be resolved without a change to condition 3.3.1.d, this requirement will remain unchanged

2. 3.5.6 Semi Annual Reports:

12/17/2012 Comments

The signature of the responsible official is redundant to requirement 3.5.1 and may be deleted. EQT requests that the line be deleted.

Response: The sentence in condition 3.5.6. which states “All required reports must be certified by a responsible official consistent with 45CSR§30-4.4” comes directly from 45CSR§30-5.1.c.3.A which is the underlying rule for this requirement. These conditions are required to be in the Title V permit per 45CSR§30-5.1. As such, the requested change will not be made.

3. 3.5.8.a.1. Deviations

12/17/2012 Comments

The “certification by a responsible official” is redundant to the requirement at Condition 3.5.1 and may be deleted. EQT requests that the line be deleted.

Response: The sentence in condition 3.5.8.a.1 which states “ A written report of such deviation which shall include the probable cause of such deviations, and any corrective actions or preventive measures taken, shall be submitted and certified by a responsible official within (10) ten days of the deviation” comes directly from 45CSR§30-5.1.c.3.C.1 which is cited as the underlying rule for the requirement. These conditions are required to be in the Title V permit per 45CSR§30-5.1. As such, the requested change will not be made.

4. 3.5.8.a.2. Deviations

12/17/2012 Comments

The report may be submitted by persons other than a responsible official. Although a deviation report must be certified, reference to submission by a responsible official should be deleted. EQT requests that the words “by a responsible official” be deleted.

Response: The sentence in condition 3.5.8.a.2 which states “ A written report of such deviation which shall include the probable cause of such deviations, and any corrective actions or preventive measures taken, shall be submitted and certified by a responsible official within (10) ten days of the deviation” comes directly from 45CSR§30-5.1.c.3.C.2 which is cited as the underlying rule for the requirement. These conditions are required to be in the Title V permit per 45CSR§30-5.1. As such, the requested change will not be made.

5. 4.5.3.e.v. Emergency

12/17/2012 Comments

“The appropriate certification by a responsible official.” is redundant to requirement at Condition 3.5.1 and may be deleted.

Response: 45CSR§30-5.1.c.3.D states that “every report submitted under this subsection shall be certified by a responsible official.” Although, this statement may be considered redundant with 3.5.1, it does not require action by the permittee other than what is already required by the underlying rule. No change will be made to Condition 4.5.3.e.v.

6. 5.2.1 Monitoring Requirements

12/17/2012 Comments

Condition specifies GRI-GLYCalc V3 or higher. Current permit requires Version 4.0 or higher. Given that Version 3 is obsolete, it is suggested that Version 4.0 be used throughout the permit for consistency.

Response: It is agreed that consistency needs to be maintained throughout the permit but GRI-GLYCalc V3 or higher will be used throughout, so as to maintain consistency both within the permit and with 40 C.F.R. 63 Subpart HHH. Therefore in conditions 5.2.1 and 5.3.1, references to GRI-GLYCalc V4 Technical Reference User Manual and Handbook will be changed to read GRI-GLYCalc V3 or higher Technical Reference User Manual and Handbook.

7. 5.2.1. Monitoring Requirements

12/17/2012 Comments

A requirement in the permit to perform quarterly monitoring, with measurements of the actual operating parameters listed in this condition to support GLYCalc is new, and unnecessarily increases the complexity and regulatory burden without substantively changing the intention or methodology of monitoring requirements. Logansport is an area source with a calculated PTE for total HAPs of 6.22 TPY, and actual emissions under 2-TPY based on conservative application of maximum design capacity and available operating data. There is no foreseeable circumstance which would cause the existing equipment to be a major, or where the use of actual annual average operating parameters, measured at least quarterly would increase emissions above the levels calculated using worst-case maximum design criteria.

EQT requests that the language from the previous Title V Operating Permit R30-10300033-2007 be restored in the permit. This change has no practical effect insofar as the existing (2007) requirement produces the highest possible HAP emissions results, but allows the use of actual monitored and recorded operating parameters to demonstrate the facility is an area source. Most of the operating parameters listed in the proposed draft condition 5.2.1 are design criteria that will not change, or may not be measurable. We are not aware of any change in the regulations or changes in the way TEG Dehydrator emissions are calculated that would preclude continuing the previously effective condition 5.2.1.

12/28/2012 Revised Comments

EQT acknowledges the need to define what constitutes an excursion under a monitoring plan. Previously submitted comments on this section are withdrawn with the exception of consistent reference to GRI-GLYCalc version.

Response: No response made because the comment was retracted in a letter dated December 28, 2012 that contained comment revisions.

8. 5.2.3 Visible Emissions

12/28/2012 Revised Comments

EQT supports the approach proposed in this condition to determine the presence of visible emissions using Method 22, and conducting Method 9 only if visible emissions are determined to be present, and cannot be corrected.

Response: No changes were requested from the commenter.

9. 5.3.1. Testing Requirements

12/17/2012 Comments

Logansport has tested and reported extended wet-gas analyses on an annual basis for several years as required by the existing permit. We are surprised that the Draft permit backslides to not require this monitoring for

another three years. If this was not the intention of the Department, EQT requests that the previous language from Permit R30-10300033-2007 condition 5.3.1 be restored in its entirety.

12/28/2012 Revised Comments

Comments on this section are withdrawn.

Response: No response made because the comment was retracted in a letter dated December 28, 2012 that contained comment revisions.

10. 5.4 Recordkeeping Requirements

12/17/2012 Comments

The Draft permit contains significantly simplified recordkeeping requirements that appear to significantly streamline the previous recordkeeping requirements without changing stringency. EQT agrees with this approach.

Response: This comment did not request changes to be made to the permit.

11. 5.5.1 Reporting Requirements

12/17/2012 Comments

Condition specifies GRI-GLYCalc V3 or higher. The current permit (2007) requires Version 4.0 or higher. Given that Version 3 is obsolete, EQT requests that Version 4.0 be referenced throughout the permit for consistency.

12/28/2012 Revised Comments

GRI-GLYCalc Version should be consistently referenced throughout the permit.

Response: See Response 6.

12. 5.5.1 Reporting Requirements

12/17/2012 Comments

EQT requests that the condition be revised consistent with the language in Condition 5.5.2 of Permit 30-10300033-2007. This will resolve the reference GLYCalc V4 for consistency. In addition, we do not agree that reporting “The location of the compressor station with respect to custody transfer point” is relevant and object to including this new requirement. The condition was previously the location of the compressor station relative to the liquids extraction plant, to which we have no objection.

12/28/2012 Revised Comments

GRI-GLYCalc Version should be consistently referenced throughout the permit.

Following discussion with WVDEP Staff, EQT withdraws comments concerning the term “custody transfer point” is consistent with the regulations, and will be identified and used. Comments objecting to the use of custody transfer point, are withdrawn.

Response: See response 6.

13. 5.5.1 Reporting Requirements:

12/17/2012 Comments

The signature of the responsible official is redundant to the requirement at Condition 3.5.1. EQT requests that the condition be revised and the sentence, “This report shall be signed by a responsible official upon submittal” be deleted.

Response: 45CSR§30-5.1.c.3.D states that “every report submitted under this subsection shall be certified by a responsible official.” The authority cited under condition 5.5.1 is 45CSR§30-5.1.c which requires certification by a responsible official. Although, this statement may be considered redundant with 3.5.1, it does not require action by the permittee other than what is required by the underlying rule. No change will be made to Condition 5.5.1.